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JUDGE GARDEN

11 CIV 7268

*Attorneys for Plaintiffs Buccellati Holding Italia SPA
and Buccellati, Inc.*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

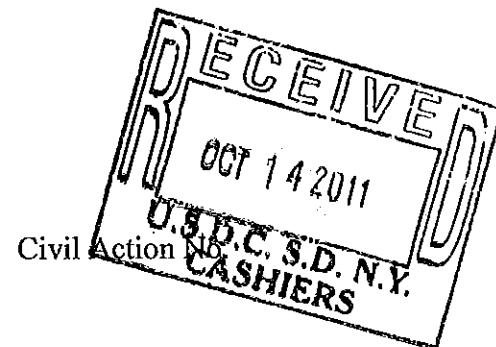
BUCCELLATI HOLDING ITALIA SPA and
BUCCELLATI, INC.

Plaintiffs,

- v -

LAURA BUCCELLATI, LLC, LAURA
BUCCELLATI, LILIAN AZEL, ABC
CORPORATIONS 1-10, and JOHN DOES 1-10

Defendants.



COMPLAINT

Plaintiffs Buccellati Holding Italia SPA and Buccellati, Inc. (collectively "Buccellati"), by and through their attorneys, Edwards Wildman Palmer LLP, complain and allege against defendants Laura Buccellati LLC, Ms. Laura Buccellati, Ms. Lilian Azel, ABC Corporations 1-10, and John Does 1-10 (collectively, "Laura Buccellati") as follows:

NATURE OF THE ACTION

1. Buccellati seeks injunctive relief and damages for acts of trademark infringement, false designation of origin, trademark dilution, unfair competition, and unfair and deceptive trade

practices, engaged in by Laura Buccellati in violation of the laws of the United States and the State of New York.

JURISDICTION AND VENUE

2. This Court has jurisdiction over the subject matter of this action pursuant to Section 39 of the Lanham Act (15 U.S.C. § 1121), and 28 U.S.C. §§ 1331 and 1338, and has supplemental jurisdiction pursuant to 28 U.S.C. § 1367(a). Buccellati's claims are predicated upon the Trademark Act of 1946, as amended, 15 U.S.C. § 1051 *et seq.*, and substantial and related claims under the statutory and common law of the State of New York.

3. Venue is properly founded in this judicial district pursuant to 28 U.S.C. § 1391(b) and (c) and 1400(a) and (b), because Laura Buccellati is subject to personal jurisdiction within this judicial district and/or because events giving rise to these claims occurred within this judicial district.

THE PARTIES

4. Plaintiff Buccellati Holding Italia SPA is a corporation organized and existing under the laws of the country of Italy, having its principal place of business at Via Lodovico Mancini, 1, Milan 20129, Italy. Buccellati Holding Italia SPA is engaged, *inter alia*, in the manufacture and sale of products bearing the world famous BUCCELLATI Trademarks (as defined in Paragraph 11 herein) including, but not limited to, jewelry, watches, silverware, writing instruments, ornamental boxes, cutlery, belt buckles, and handbags.

5. Plaintiff Buccellati Inc. is a corporation organized and existing under the laws of the State of New York, having its principal place of business at 1250 Waters Place, Penthouse Suite 2, Bronx, New York 10461. Buccellati Inc. is the sole and exclusive distributor in the United States of products bearing the world famous BUCCELLATI Trademarks (as defined

herein) including, but not limited to, jewelry, watches, silverware, writing instruments, ornamental boxes, cutlery, belt buckles, and handbags.

6. Upon information and belief, defendant Laura Buccellati LLC is a limited liability company organized and existing under the laws of the State of Florida, having an address for service of process at 1000 Venetian Way, Suite 301, Miami, Florida 33139. Laura Buccellati LLC is engaged in the business of, among other things, selling handbags in the State of New York and elsewhere in the United States.

7. Upon information and belief, defendant Ms. Laura Buccellati, an individual and a co-founder of Laura Buccellati LLC, and resident of the State of Florida, is the conscious and active force behind the wrongful acts of Laura Buccellati LLC, complained of herein, and such wrongful acts have been and are engaged in for the benefit of Laura Buccellati LLC and for her own individual gain and benefit.

8. Upon information and belief, defendant Ms. Lilian Azel, an individual and a co-founder of Laura Buccellati LLC, and resident of the State of Florida, is the conscious and active force behind the wrongful acts of Laura Buccellati LLC, complained of herein, and such wrongful acts have been and are engaged in for the benefit of Laura Buccellati LLC and for her own individual gain and benefit..

9. ABC Corporations 1-10 and John Does 1-10 are corporations and other legal entities and/or individuals whose identities or location are unknown to Buccellati, and who are also engaged in designing, manufacturing, advertising, promoting, distributing, importing, selling, and/or offering for sale products under agreement from Laura Buccellati and/or Ms. Laura Buccellati and/or Ms. Lilian Azel.

THE FAMOUS BUCCELLATI BRAND AND TRADEMARKS

10. Buccellati is the owner, and the sole and exclusive distributor, of high-quality products and services sold and/or offered for sale under the world famous BUCCELLATI brand. Since the 1700s, the Buccellati family has been crafting some of the finest jewelry in the world. Beginning in the 1920s, with the release of its ruby encrusted Evening Bag, Buccellati has manufactured and sold handbags, clutches, and purses, made of various materials, including, leather, gold, silver, and textiles. Today the BUCCELLATI brand is synonymous with luxury, quality, and craftsmanship, and consumers and the trade instantly identify Buccellati as the source of all products and services bearing the BUCCELLATI name and trademark.

11. Buccellati's products and services are sold and/or offered for sale under its various trademarks, including BUCCELLATI and LAURA (collectively, the "BUCCELLATI Trademarks"). Buccellati is the owner of the right, title and interest in and to, inter alia, the following federally registered trademarks and service marks:

<u>Mark</u>	<u>Reg. No.</u>	<u>Reg. Date</u>	<u>First Use</u>	<u>Int'l Class(es)</u>
BUCCELLATI	841,635	1/2/1968	12/13/1952	8, 14
BUCCELLATI	865,932	3/14/1969	12/31/1958	35
BUCCELLATI	2,156,171	5/12/2008	12/31/1952	14

Attached hereto as Exhibit A are true and correct copies of the U.S. Patent and Trademark Office registration certificates evidencing Buccellati's ownership of the foregoing trademarks (collectively, the "BUCCELLATI Registrations"). All of the registrations set forth in Exhibit A are valid, subsisting, and in full force and effect. Moreover, all of the registrations are incontestable pursuant to 15 U.S.C. § 1065, and have become distinctive of Buccellati's products and services in commerce pursuant to 15 U.S.C. § 1052.

12. Buccellati's products bearing or displaying the BUCCELLATI Trademarks include jewelry, watches, silverware, writing instruments, ornamental boxes, cutlery, belt buckles, handbags, and other products. Buccellati offers retail services in the United States, including storefront locations in New York, New York, Beverly Hills, California, and Aspen, Colorado. Examples of the BUCCELLATI Trademarks as they are used in connection with Buccellati's products and services are attached hereto as Exhibit B.

13. Buccellati has extensively advertised and promoted the products manufactured and services offered under the BUCCELLATI Trademarks. Millions of consumers have been exposed to the BUCCELLATI Trademarks through extensive advertising campaigns, in mainstream and industry magazines and other periodicals, as depicted in motion pictures, on the Internet, and in other forms of unsolicited media coverage. Products bearing the BUCCELLATI Trademarks are closely associated with Buccellati's reputation in the eyes of the public and the trade. The BUCCELLATI Trademarks are, thus, invaluable assets to Buccellati.

14. Further, over many years, Buccellati has realized enormous and ever-increasing success in its sales of products bearing the BUCCELLATI Trademarks, and for the last five years has had tens of millions of dollars in sales in the United States alone.

15. Moreover, Buccellati always endeavors to maintain the prestige and reputation for quality and luxury associated with the BUCCELLATI Trademarks. Strict quality control standards are imposed in the manufacture of all the products bearing the BUCCELLATI Trademarks. Buccellati's painstaking adherence to only the highest quality standards has resulted in widespread and favorable public acceptance among consumers for all products bearing the BUCCELLATI Trademarks.

16. As a result of Buccellati's extensive advertising and promotion, adherence to the highest quality standards, and extraordinary sales success, the BUCCELLATI Trademarks, as well as other well known designs, logos and indicia introduced by Buccellati, are among the most widely-recognized trademarks in the United States, possessing strong secondary meaning among consumers and the trade, immediately identifying Buccellati as the exclusive source of the products to which they are affixed, and signifying goodwill of incalculable value.

DEFENDANTS' ACTS OF INFRINGEMENT AND UNFAIR COMPETITION

17. Buccellati has discovered that Laura Buccellati is engaging in designing, manufacturing, promoting, importing, selling, and offering for sale consumer products in a variety of product categories under the LAURA BUCCELLATI name and trademark, in conjunction with various other designs, logos, and indicia that are imitations of the BUCCELLATI Trademarks (the "Infringing Mark"). Upon information and belief, Laura Buccellati is using the Infringing Mark on goods and services that are identical or closely related to products bearing the famous BUCCELLATI Trademarks, including, but not limited to, handbags, carryalls, purses, wallets, belts, and scarves. Copies of products sold by and marketing materials published by Laura Buccellati depicting the Infringing Mark are attached hereto as Exhibit C.

18. Upon information and belief, Ms. Laura Buccellati is a Buccellati family member, who sold her entire interest in the Buccellati companies in or about 1989, and who otherwise has no commercial affiliation with Buccellati, but has individually and through Laura Buccellati LLC attempted to capitalize on the popularity of the BUCCELLATI Trademarks by using and/or permitting various companies to use the Infringing Mark.

19. Upon information and belief, Ms. Lilian Azel, a co-founder with Ms. Laura Buccellati of Laura Buccellati LLC, has no affiliation with Buccellati, but has individually and through Laura Buccellati LLC attempted to capitalize on the popularity of the BUCCELLATI Trademarks by using any/or permitting various companies to use the Infringing Mark.

20. Upon information and belief, ABC Corporations 1-10 and John Does 1-10, pursuant to agreements with Laura Buccellati LLC and/or Laura Buccellati and/or Lilian Azel, have designed, manufactured, advertised, promoted, distributed, imported, sold and/or offered for sale, without authorization or license, additional products bearing the Infringing Mark. Upon learning the identities of these defendants, Buccellati will seek leave to amend its complaint to add them as parties.

21. Upon information and belief, Ms. Laura Buccellati, through Laura Buccellati LLC, has, on several occasions over a period of years, attempted to register trademarks comprising or containing the name LAURA BUCCELLATI, both in the United States and internationally. In the United States, such attempted registration has been refused on the basis that the name LAURA BUCCELLATI is likely to be confused with the world famous BUCCELLATI Trademarks. On January 6, 2010, Laura Buccellati commenced an opposition proceeding against Buccellati U.S. Trademark Application Serial No. 77/281,335 for BUCCELLATI. This proceeding is currently pending before the United States Patent and Trademark Office.

22. On October 21, 2010, Buccellati sent a letter to Laura Buccellati requesting that it immediately cease all use of the Infringing Mark in connection with the manufacture, distribution, and sale of handbags and related products. Laura Buccellati failed to substantively

respond to Buccellati's letter, and continued to manufacture, distribute, and sell products bearing the Infringing Mark.

23. Together with the Infringing Mark, Laura Buccellati LLC is using Ms. Laura Buccellati's relationship with the Buccellati family in promotional material to suggest an association with Buccellati, all with the deliberate intention to cause consumers and the trade to believe that the products bearing the Infringing Mark are authorized, sponsored, approved, endorsed or licensed by Buccellati, or that Laura Buccellati LLC, or Ms. Laura Buccellati, is in some way commercially affiliated with Buccellati. For example, at www.laurabuccellati.com, Laura Buccellati LLC associates its products with the famous BUCCELLATI Trademarks and the "Buccellati legacy" by claiming that the "collection of fine leather accessories follows in the footsteps of [the Buccellati] family's tradition of excellence and impeccable craftsmanship." Moreover, Laura Buccellati's products and services are marketed with the Infringing Mark, LAURA BUCCELLATI, surrounded by a bracelet design element, reminiscent of jewelry, further suggesting a connection with the famous Buccellati brand. In another attempt to associate its mark with Buccellati, Laura Buccellati uses the slogan "Jewel of a Bag" to suggest a relationship between her products and Buccellati's famed jewelry. For example, at www.laurabuccellati.com, Laura Buccellati LLC directly associates its products with Buccellati, stating: "Coined as 'a jewel of a bag,' Laura's Signature Collection follows in the footsteps of the Buccellati family tradition of excellence and impeccable craftsmanship." Copies of the referenced marketing materials published by Laura Buccellati are attached hereto as Exhibit D.

24. Upon information and belief, Laura Buccellati's use of the Infringing Marks caused (and will likely continue to cause): actual confusion in the marketplace, harm to the

business reputation and goodwill of Buccellati, and damage to Buccellati's business relations with consumers and prospective consumers.

25. Laura Buccellati is well aware of the extraordinary fame and strength of the BUCCELLATI Trademarks, and the incalculable goodwill symbolized thereby, and that the Infringing Mark cannot be used as an indicator of source or sponsorship for the products they are designing, manufacturing, distributing, importing, and/or selling. Accordingly, Laura Buccellati has been engaging in the above-described unlawful activities knowingly and intentionally, or with reckless disregard for Buccellati's rights in the BUCCELLATI Trademarks.

FIRST CLAIM FOR RELIEF
TRADEMARK INFRINGEMENT (15 U.S.C. § 1114(1)(a))

26. The allegations set forth in paragraphs 1 through 25 hereof are adopted and incorporated by reference as if fully set forth herein.

27. Laura Buccellati's use of the Infringing Mark is intended to cause, has caused and is likely to continue to cause confusion, mistake and deception among the general consuming public and the trade as to whether products bearing the Infringing Mark originate from, or are affiliated with, sponsored by, or endorsed by Buccellati.

28. Upon information and belief, Laura Buccellati has acted with knowledge of Buccellati's ownership of the BUCCELLATI Registrations and with the deliberate intention to unfairly benefit from the incalculable goodwill symbolized thereby.

29. Laura Buccellati's acts constitute trademark infringement in violation of Section 32 of the Lanham Act (15 U.S.C. § 1114).

30. Upon information and belief, by its acts, Laura Buccellati has made and will make substantial profits and gains to which it is not in law or equity entitled.

31. Upon information and belief, Laura Buccellati intends to continue its infringing acts, and will continue to willfully infringe the BUCCELLATI Registrations, unless restrained by this Court.

32. Laura Buccellati's acts have damaged and will continue to damage Buccellati, and Buccellati has no adequate remedy at law.

SECOND CLAIM FOR RELIEF
FALSE DESIGNATION OF ORIGIN (15 U.S.C. § 1125(a))

33. The allegations set forth in paragraphs 1 through 32 hereof are adopted and incorporated by reference as if fully set forth herein.

34. Laura Buccellati's use of the Infringing Mark and other designations, and indicia, such as "Jewel of a Bag," as well as association with the Buccellati name and goodwill established over the years by Buccellati, is intended, and is likely to confuse, mislead, or deceive consumers, the public, and the trade as to the origin, source, sponsorship, association, or affiliation of products bearing the Infringing Mark, and is intended, and is likely to cause such parties to believe in error that the products bearing the Infringing Mark have been authorized, sponsored, approved, endorsed or licensed by Buccellati, or that Laura Buccellati is in some way affiliated with Buccellati.

35. Laura Buccellati's acts constitute a false designation of origin, and false and misleading descriptions and representations of fact, all in violation of Section 43(a) of the Lanham Act (15 U.S.C. § 1125(a)).

36. Upon information and belief, by its acts, Laura Buccellati has made and will make substantial profits and gains to which it is not in law or equity entitled.

37. Upon information and belief, Laura Buccellati intends to continue its willfully infringing acts unless restrained by this Court.

38. Laura Buccellati's acts have damaged and will continue to damage Buccellati, and Buccellati has no adequate remedy at law.

THIRD CLAIM FOR RELIEF
TRADEMARK DILUTION (15 U.S.C. § 1125(c))

39. The allegations set forth in paragraphs 1 through 38 hereof are adopted and incorporated by reference as if fully set forth herein.

40. Buccellati is the exclusive owner of the BUCCELLATI Trademarks in the United States.

41. The BUCCELLATI Trademarks are strong and distinctive marks that have been in use for many years and have achieved enormous and widespread public recognition.

42. The BUCCELLATI Trademarks are famous within the meaning of Section 43(c) of the Lanham Act (15 U.S.C. § 1125(c)).

43. Laura Buccellati's use of the Infringing Mark, without authorization from Buccellati, is diluting the distinctive quality of the BUCCELLATI Trademarks and decreasing the capacity of such marks to identify and distinguish Buccellati's products and services.

44. Laura Buccellati has intentionally and willfully diluted the distinctive quality of the famous BUCCELLATI Trademarks in violation of Section 43(c) of the Lanham Act, 15 U.S.C. § 1125(c).

45. Upon information and belief, by its acts, Laura Buccellati has made and will make substantial profits and gains to which it is not in law or equity entitled.

46. Upon information and belief, Laura Buccellati intends to continue its willfully infringing acts unless restrained by this Court.

47. Laura Buccellati's acts have damaged and will continue to damage Buccellati, and Buccellati has no adequate remedy at law.

FOURTH CLAIM FOR RELIEF
COMMON LAW TRADEMARK INFRINGEMENT

48. The allegations set forth in paragraphs 1 through 47 hereof are adopted and incorporated by reference as if fully set forth herein.

49. Buccellati owns all right, title, and interest in and to the BUCCELLATI Trademarks as aforesaid, including all common law rights in such marks, and such marks are distinctive.

50. The aforesaid acts of Laura Buccellati constitute trademark infringement in violation of the common law of the State of New York.

51. Upon information and belief, Laura Buccellati has made and will make substantial profits and gains to which it is not in law or equity entitled.

52. Upon information and belief, Laura Buccellati intends to continue its willfully infringing acts unless restrained by this Court.

53. Laura Buccellati's acts have damaged and will continue to damage Buccellati, and Buccellati has no adequate remedy at law.

FIFTH CLAIM FOR RELIEF
COMMON LAW UNFAIR COMPETITION

54. The allegations set forth in paragraphs 1 through 53 hereof are adopted and incorporated by reference as if fully set forth herein.

55. The aforesaid acts of Laura Buccellati constitute unfair competition in violation of the common law of the State of New York.

56. Upon information and belief, by its acts, Laura Buccellati has made and will make substantial profits and gains to which it is not in law or equity entitled.

57. Upon information and belief, Laura Buccellati intends to continue its willfully infringing acts unless restrained by this Court.

58. Laura Buccellati's acts have damaged and will continue to damage Buccellati, and Buccellati has no adequate remedy at law.

SIXTH CLAIM FOR RELIEF
DECEPTIVE ACTS AND PRACTICES (N.Y. G.B.L. § 349)

59. The allegations set forth in paragraphs 1 through 58 hereof are adopted and incorporated by reference as if fully set forth herein.

60. The aforesaid acts of Laura Buccellati constitute consumer-oriented conduct that has affected the public interest of New York and has resulted and/or may result in injury to consumers in New York and/or harm to the public.

61. By the acts described herein, Laura Buccellati has willfully engaged in deceptive acts or practices in the conduct of its business in violation of New York General Business Law § 349.

62. Upon information and belief, by its acts, Laura Buccellati has made and will make substantial profits and gains to which it is not in law or equity entitled.

63. Upon information and belief, Laura Buccellati intends to continue its willfully infringing acts unless restrained by this Court.

64. Laura Buccellati's acts have damaged and will continue to damage Buccellati, and Buccellati has no adequate remedy at law.

SEVENTH CLAIM FOR RELIEF

TRADEMARK DILUTION (N.Y. G.B.L. § 360-L)

65. The allegations set forth in paragraphs 1 through 64 hereof are adopted and incorporated by reference as if fully set forth herein.

66. Buccellati is the exclusive owner of the BUCCELLATI Trademarks throughout the United States, including the State of New York.

67. Through prominent, long and continuous use in commerce, including commerce within the State of New York, BUCCELLATI Trademarks have become and continue to be famous and distinctive.

68. By the acts described herein, Laura Buccellati has diluted the distinctiveness of the BUCCELLATI Trademarks and has caused a likelihood of harm to Buccellati's business reputation in violation of New York General Business Law § 360-l.

69. Upon information and belief, by its acts, Laura Buccellati has made and will make substantial profits and gains to which it is not in law or equity entitled.

70. Upon information and belief, Laura Buccellati intends to continue its willfully infringing acts unless restrained by this Court.

71. Laura Buccellati's acts have damaged and will continue to damage Buccellati, and Buccellati has no adequate remedy at law.

PRAYER FOR RELIEF

WHEREFORE, Buccellati demands judgment against Laura Buccellati as follow:

1. Finding that (i) Laura Buccellati has violated Section 32 of the Lanham Act (15 U.S.C. § 1114); Section 43(a) of the Lanham Act (15 U.S.C. § 1125(a)); and Section 43(c) of the Lanham Act (15 U.S.C. § 1125(c)); (ii) Laura Buccellati has engaged in deceptive acts and practices under New York General Business Law § 349; (iii) Laura Buccellati has diluted the

BUCELLATI Trademarks in violation of New York General Business Law § 360-1; (iv) Laura Buccellati has engaged in trademark infringement and unfair competition under the common law of New York; and (v) Laura Buccellati has been unjustly enriched in violation of New York common law.

2. Granting an injunction preliminarily and permanently restraining and enjoining Laura Buccellati, its officers, agents, employees and attorneys, and all those persons or entities in active concert or participation with them, or any of them, from:

(a) manufacturing, importing, advertising, marketing, promoting, supplying, distributing, offering for sale or selling any products which bear the Infringing Mark, the BUCCELLATI Trademarks, or any other mark substantially or confusingly similar thereto, and engaging in any other activity constituting an infringement of any of Buccellati's rights in the BUCCELLATI Trademarks, or any other trademark owned by Buccellati; and

(b) engaging in any other activity constituting unfair competition with Buccellati, or acts and practices that deceive the public and/or the trade; and

(c) engaging in any activity that will cause the distinctiveness of the BUCCELLATI Trademarks to be diluted.

3. Directing such other relief as the Court may deem appropriate to prevent the trade and public from deriving any erroneous impression that any product at issue in this case that has been manufactured, imported, advertised, marketed, promoted, supplied, distributed, offered for sale or sold by Laura Buccellati, has been authorized by Buccellati, or is related to or associated in any way with Buccellati or its products.

4. Directing that Laura Buccellati account to and pay over to Buccellati all profits realized by its wrongful acts and directing that such profits be trebled in accordance with Section 35 of the Lanham Act (15 U.S.C. § 1117).

5. At its election, awarding Buccellati statutory damages in accordance with Section 35 of the Lanham Act (15 U.S.C. § 1117).

6. Awarding Buccellati its actual damages in accordance with Section 35 of the Lanham Act (15 U.S.C. § 1117).

7. Awarding Buccellati its costs and attorney's fees and investigatory fees and expenses to the full extent provided for by Section 35 of the Lanham Act (15 U.S.C. § 1117).

8. Requiring Laura Buccellati to deliver to Buccellati for destruction or other disposition all remaining inventory of all products bearing the Infringing Mark, including all advertising, promotional and marketing materials therefor, as well as all means of making same.

9. Requiring Laura Buccellati to remove from the website at domain name *www.laurabuccellati.com* all advertising, promotional, and marketing materials and information bearing or incorporating the Infringing Marks, as well as assign the domain name *www.laurabuccellati.com* to Buccellati.

10. Awarding Buccellati pre-judgment interest on any monetary award made part of the judgment against Laura Buccellati.

11. Awarding Buccellati such additional and further relief as the Court deems just and proper.

Dated: New York, New York
October 14, 2011

EDWARDS WILDMAN PALMER LLP

By: 

Perla M. Kuhn (PK 9743)
Rory J. Radding (RR 4042)
Jennifer L. Dereka (JD 1577)
750 Lexington Avenue
New York, New York 10022
Phone (212) 308-4411
Fax (212) 308-4844

*Attorneys for Plaintiffs Buccellati Holding Italia SPA
and Buccellati, Inc.*

EXHIBIT A

1050270

THE UNITED STATES OF AMERICA

TO ALL TO WHOM THESE PRESENTS SHALL COME:

UNITED STATES DEPARTMENT OF COMMERCE

United States Patent and Trademark Office

October 06, 2011

THE ATTACHED U.S. TRADEMARK REGISTRATION 841,635 IS CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF 20 YEARS FROM *January 02, 1968*

2nd RENEWAL FOR A TERM OF 10 YEARS FROM *January 02, 2008*

SECTION 8 & 15

LESS GOODS

SAID RECORDS SHOW TITLE TO BE IN:

BUCCELLATI HOLDING ITALIA S.P.A.

AN ITALY CORPORATION

By Authority of the

Under Secretary of Commerce for Intellectual Property

and Director of the United States Patent and Trademark Office



P. R. GRANT

Certifying Officer



ERRR U.S. C.R. 40

United States Patent and Trademark Office
Renewal

Reg. No. 841,635
Registered Jan. 2, 1968
OG Date Aug. 2, 1988

TRADEMARK
PRINCIPAL REGISTER

BUCELLATI

BUCELLATI, INC. (NEW YORK CORPORATION)
46 E. 57TH ST.
NEW YORK, NY 10022, BY CHANGE OF
NAME FROM MARIO BUCELLATI
INC. (NEW YORK CORPORATION)
NEW YORK, NY
SEC. 2(f).
FOR: JEWELRY, FLATWARE,
HOLLOW WARE, AND OBJECTS
D'ART—NAMELY, ORNAMENTAL—

GASE, BOXES, AND OTHER CONTAINERS,
RELIGIOUS PIECES,
CANTER PIECES, VASES, AND OTHER
ARTISTIC RECEPTACLES, CANDLE-
STICKS, CANDLABRA, DRUGGIST-
RIES, DESK SETS, AND STATUARY,
ALL MADE OF PRECIOUS METALS, IN
CLASS 28 (INT. CL. 14).
FIRST USE 12-13-1952; IN COMMERCIAL
12-13-1952.
SUR. NO. 261,614, FILED 12-29-1966.

*In testimony whereof I have hereunto set my hand
and caused the seal of The Patent and Trademark
Office to be affixed on Aug. 2, 1988.*

COMMISSIONER OF PATENTS AND TRADEMARKS

United States Patent Office

841,635
Registered Jan. 2, 1968

PRINCIPAL REGISTER Trademark

Ser. No. 261,614, filed Dec. 29, 1966

BUCCELLATI

Mario Buccellati Inc. (New York corporation)
703 5th Ave.
New York, N.Y. 10022

For: JEWELRY, FLATWARE, HOLLOW WARE,
AND OBJECTS D'ART—NAMLY, ORNAMENTAL
SABBS, BOXES, AND OTHER CONTAINERS, RE-
LIGIOUS PIECES, CENTER PIECES, VASES, AND

OTHER ARTISTIC RECEPTACLES, CANDLE-
STICKS, CANDLABRA, DRESSER-SETS, DESK
SETS, AND STATUARY, ALL MADE OF PRECIOUS
METALS—in CLASS 28.

First use Dec. 13, 1952; in commerce Dec. 13, 1952.

M. H. MARKS, Examiner.

1858270

THE UNITED STATES OF AMERICA

TO ALL TO WHOM THESE PRESENTS SHALL COME:
UNITED STATES DEPARTMENT OF COMMERCE

United States Patent and Trademark Office

October 06, 2011

THE ATTACHED U.S. TRADEMARK REGISTRATION 865,932 IS
CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND
EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN
THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES
PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF 20 YEARS FROM *March 04, 1969*

2nd RENEWAL FOR A TERM OF 10 YEARS FROM *March 04, 2009*

SECTION 8 & 15

SAID RECORDS SHOW TITLE TO BE IN:

BUCELLATTI HOLDING ITALIA S.P.A.

AN ITALY CORPORATION

By Authority of the

Under Secretary of Commerce for Intellectual Property
and Director of the United States Patent and Trademark Office

P. R. Grant
P. R. GRANT
Certifying Officer



Prior U.S. Cls 101

United States Patent and Trademark Office
Renewal

Reg. No. 865,932
Registered Mar. 4, 1969
OG Date June 6, 1989

SERVICE MARK
PRINCIPAL REGISTER

BUCCELLATI

BUCCELLATI, INC. (NEW YORK COR-
PORATION)
46 EAST 57TH STREET
NEW YORK, NY 10022, BY CHANGE OF
NAME FROM MARIO BUCCELLATI
INC. (NBW YORK CORPORATION)
NBW YORK, NY
FOR: RETAIL JEWELRY STORE
SERVICES, IN CLASS 101 (INT. CL. 35).

FIRST USB 0-0-1952; IN COMMRCB
0-0-1958.
SBR. NO. 261,610, FILBD 12-29-1966.

*In testimony whereof, I have hereunto set my hand
and caused the seal of The Patent and Trademark
Office to be affixed on June 6, 1989.*

COMMISSIONER OF PATENTS AND TRADEMARKS

United States Patent Office

865,932
Registered Mar. 4, 1969

PRINCIPAL REGISTER Service Mark

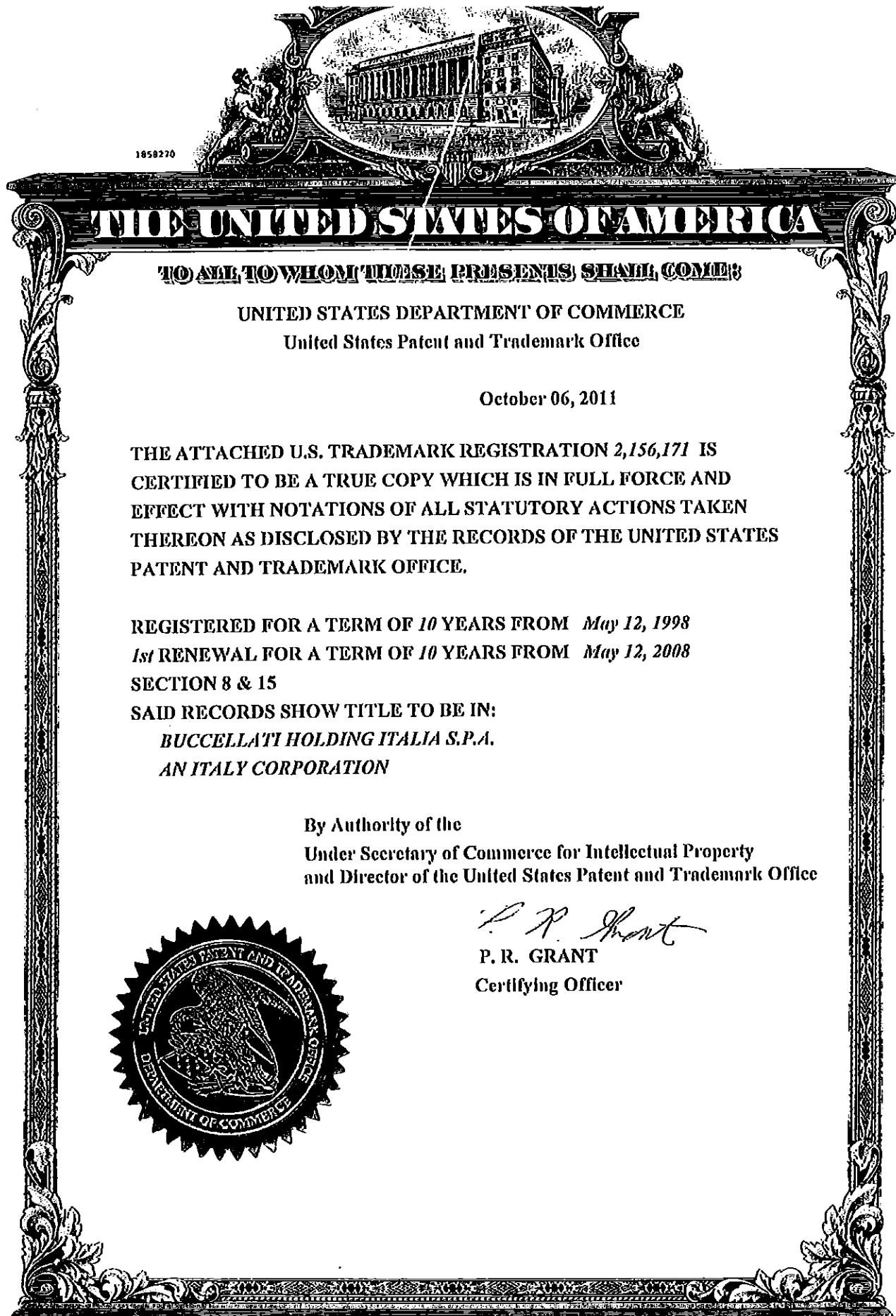
Ser. No. 261,610, filed Dec. 29, 1966

BUCCELLATI

Mario Buccellati Inc. (New York corporation)
703 5th Ave.
New York, N.Y. 10022

For: RETAIL JEWBLRY STORE SERVICES, in
CLASS 101 (INT. CL. 35).
First use during 1952; in commerce during 1958.

M. H. MARKS, Examiner.



Int. Cl.: 14

Prior U.S. Cls.: 2, 27, 28 and 50

Reg. No. 2,156,171

United States Patent and Trademark Office

Registered May 12, 1998

TRADEMARK
PRINCIPAL REGISTER

BUCCCELLATI

BUCCCELLATI HOLDING AMERICA, INC.
(NEW YORK CORPORATION)
46 EAST 57TH STREET
NEW YORK, NY 10022

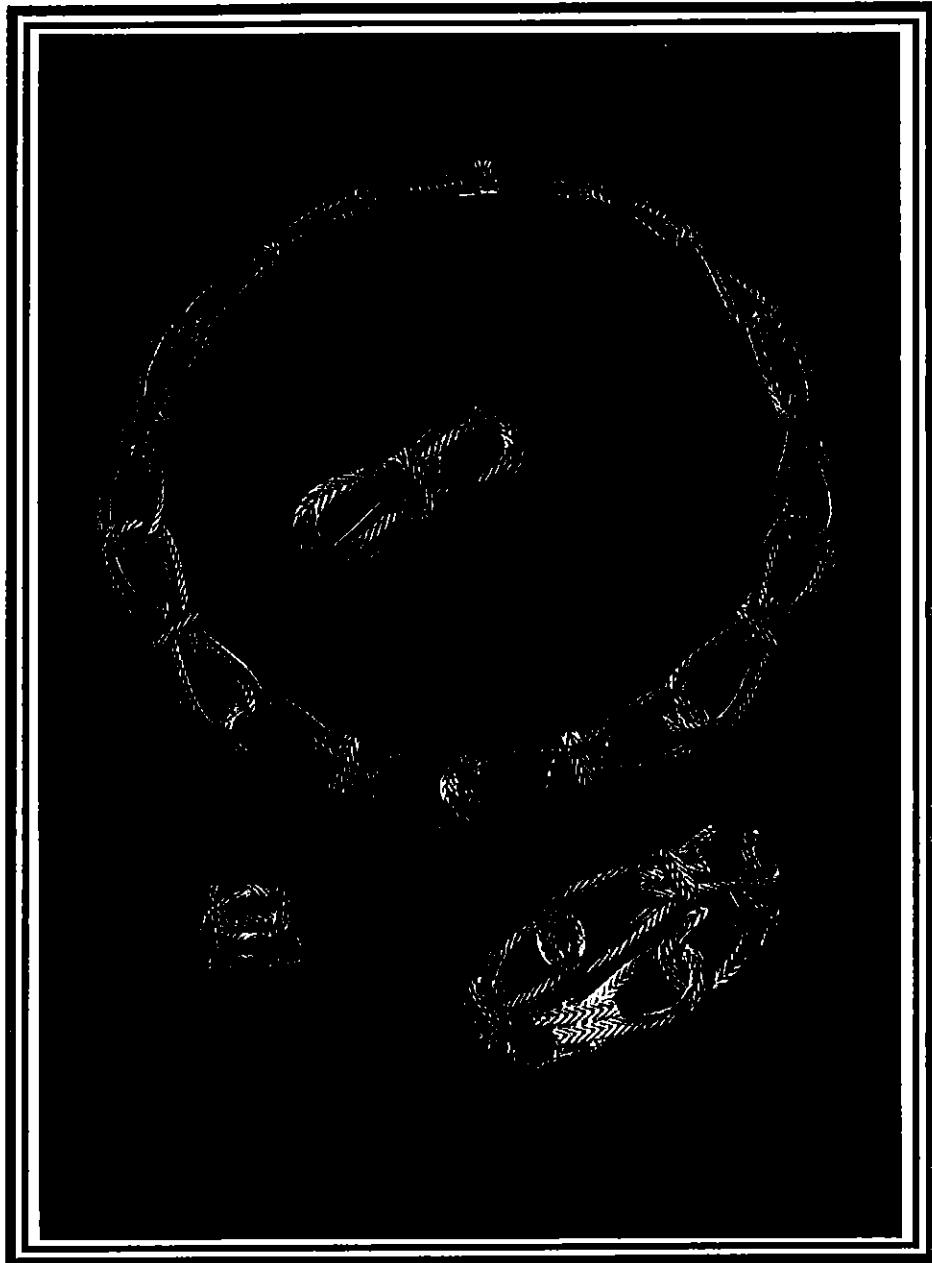
FOR: WRITING INSTRUMENTS MADE OF
PRECIOUS METALS; TIME PIECES, NAMELY,
CLOCKS, WRISTWATCHES AND POCKET
WATCHES MADE OF PRECIOUS METALS;

LORGNETTES MADE OF PRECIOUS METALS,
IN CLASS 14 (U.S. CLS. 2, 27, 28 AND 50).
FIRST USE 0-0-1952; IN COMMERCE
0-0-1952.
OWNBR OF U.S. REG. NOS. 838,777, 865,932
AND OTIIBRS.

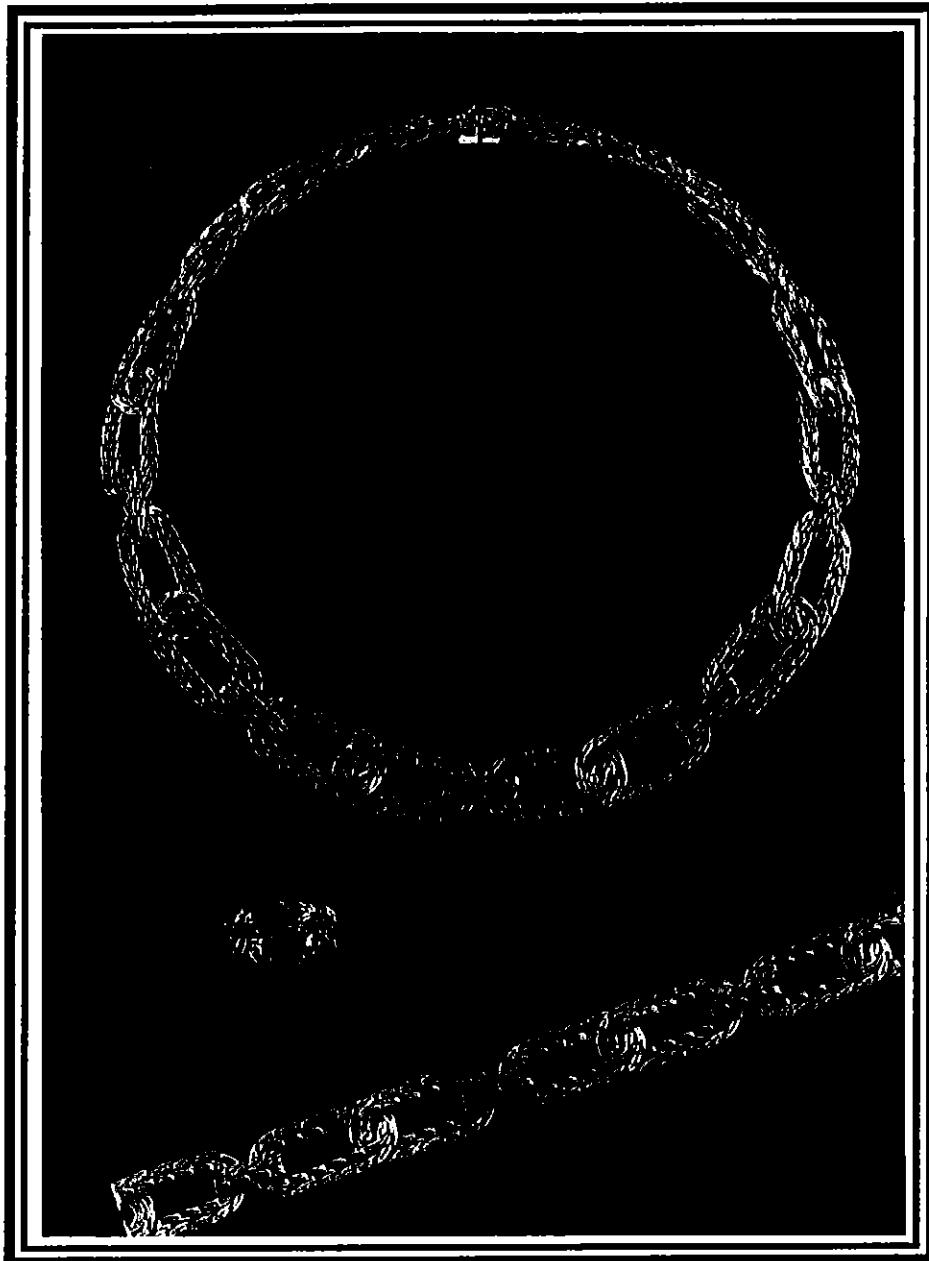
SER. NO. 75-164,587, FILED 9-12-1996.

ANIL V. GEORGE, EXAMINING ATTORNEY

EXHIBIT B



BUCELLATI



BUCELLATI

THE PRECIOUS EVENING BAGS BY GIANMARIA BUCCELLATI

Since the execution of his first creations, and then during all the years until today, engraving has been a hallmark of all the items by Mario or Gianmaria Buccellati.

Nowadays, the Buccellati jewels are still admired all over the world not only for their design and their genuinely handmade craftsmanship, but also for the engraving techniques which are still used, dating back to the tradition of the old "bottega" of the Italian Renaissance period.

Nothing will ever equal the fascination and the beauty of a goldsmith's engraving still executed with burins, ancient tools whose lines have a particular way to reflect the light, thus giving the precious metal an incomparable soft and silky appearance.

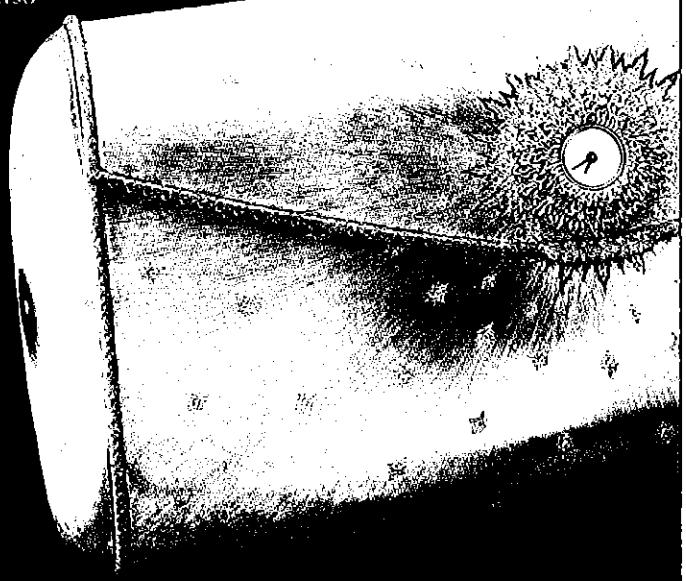
All the Buccellati creations have this unique peculiarity: gold and silver are never shiny.

They always reproduce a silky effect, obtained with the various engraving techniques.

Using a burin requires a great mastery and skill because, just like any manual and precision tool, it must have the right cutting angle, the appropriate polishing and sharpening, and it must be properly prepared in order to engrave.

The dexterity of the artisans working for Buccellati allow them to execute highly appreciated products: each of them works bent on his working table - with a small leather cushion in front of them to lay their objects on - and they really seem to apply no strength in their engraving movement. This is partially true, but everything depends on a good sharpening of the tool and on a very good knowledge of the technique.

The result is thrilling, and by having a look at the two recent

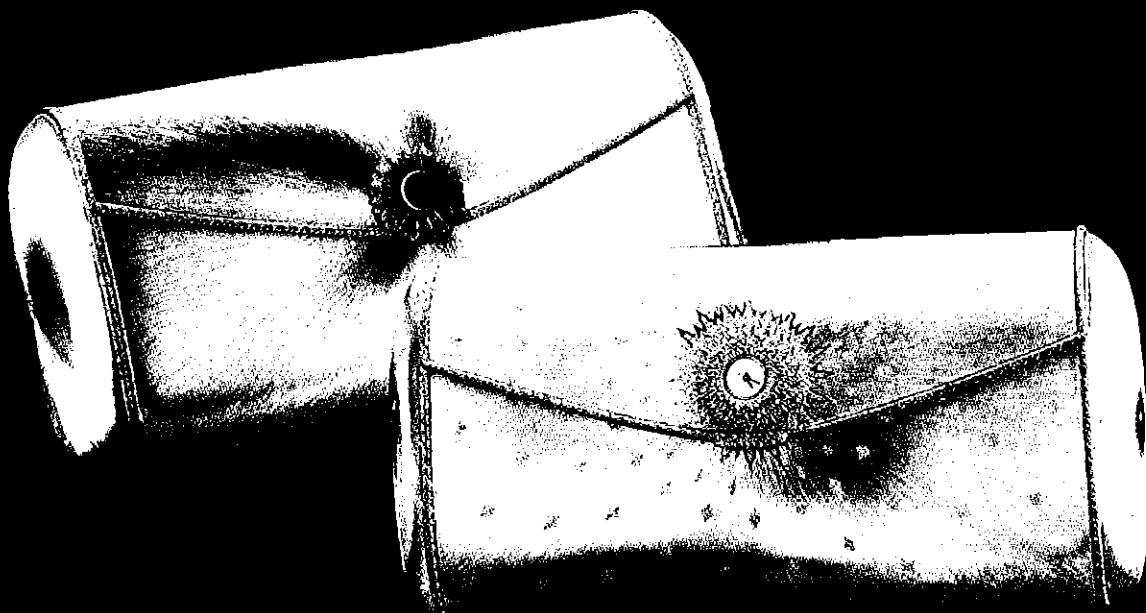


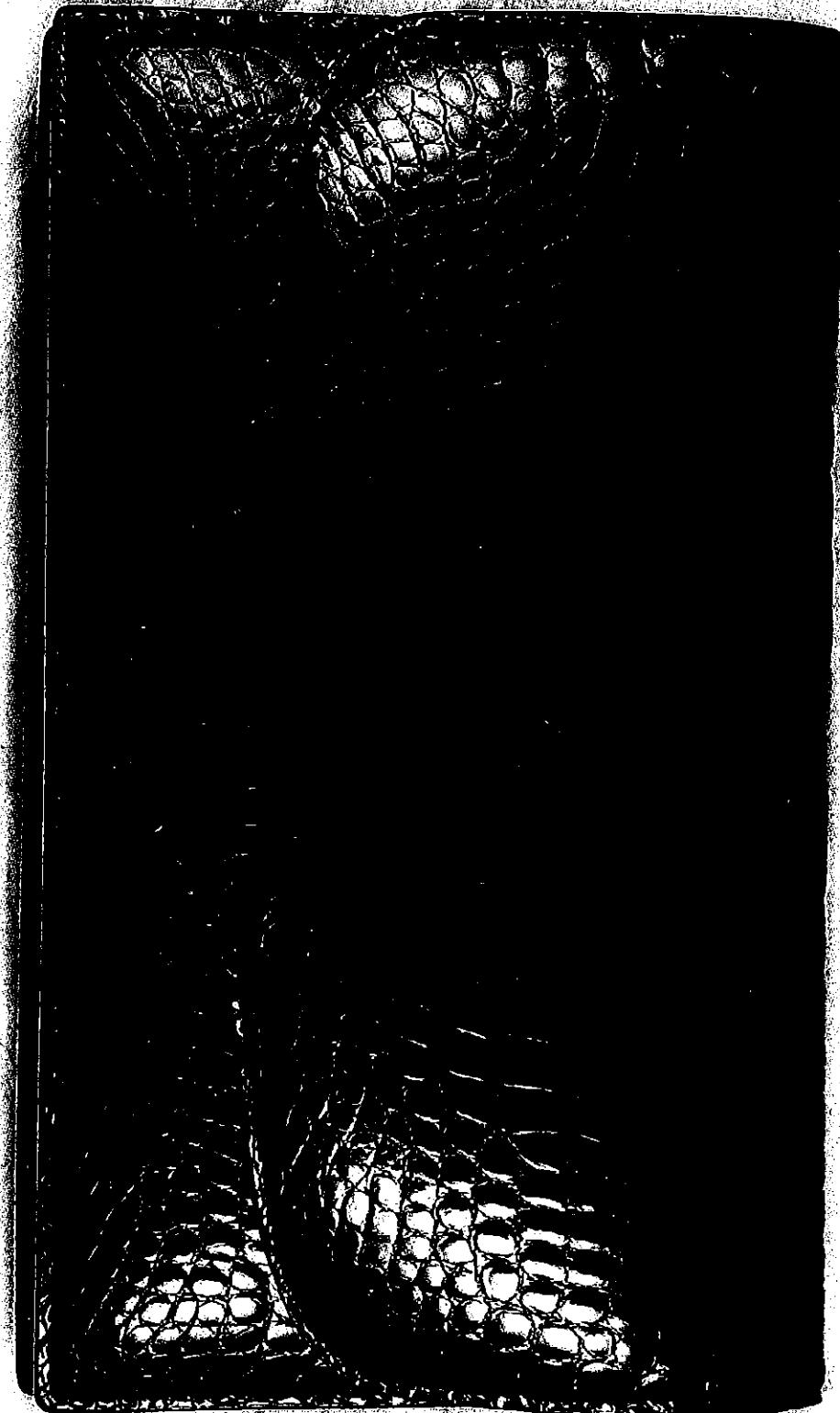
evening bags we can discover endless nuances of light, soft and sensual reflections, refined and incomparable details.

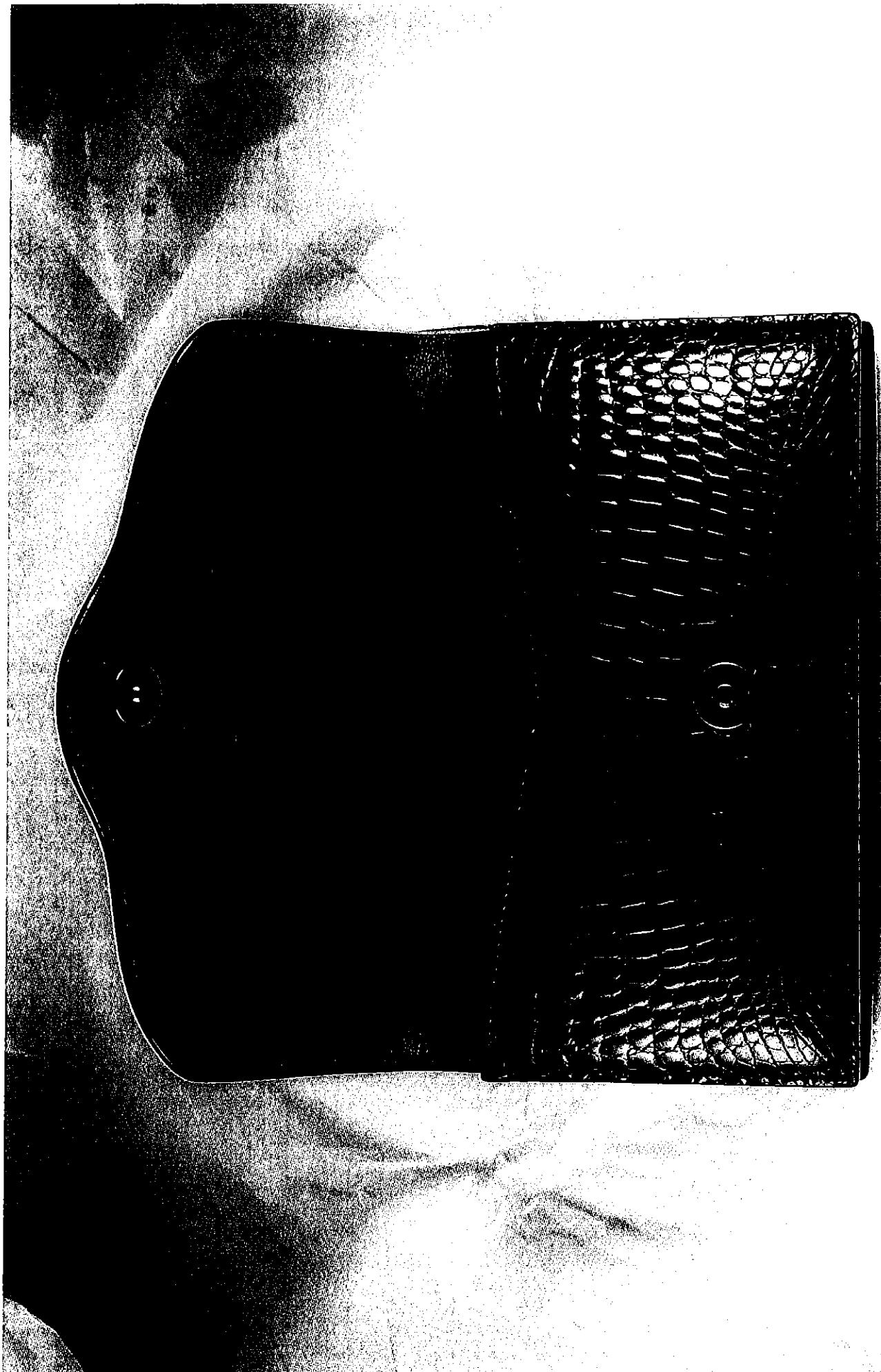
The turquoise evening box is in silver, radially "rigato" engraved, with parallel lines departing from the center, which is embellished by a flower-shaped yellow gold clasp. The petals are finely engraved and have a central shiny venation. All the borders are engraved with the lacework technique and they perfectly give the illusion of a precious seaming on a fabric.

The other evening box has the same kind of workmanship, but it is furtherly enriched an étoilée engraving dotting the whole silver surface. The lacework borders are in yellow gold and, in this case, the engraving must be absolutely considered some kind of micro-sculpture. The central clasp is formed of a small mother-of-pearl dial (10 mm diameter), contoured by dahlia petals in yellow and white gold, entirely engraved. The flower is then framed by a minutely engraved rosette, emphasizing the importance of the clasp.

Once again, Gianmario Buccellati has given life to creations of unbelievable preciousness and beauty, witness of the engraving mastery and of the emotions that he can transmit with his creativity - as usual - among the folds of light and the softness of metals.



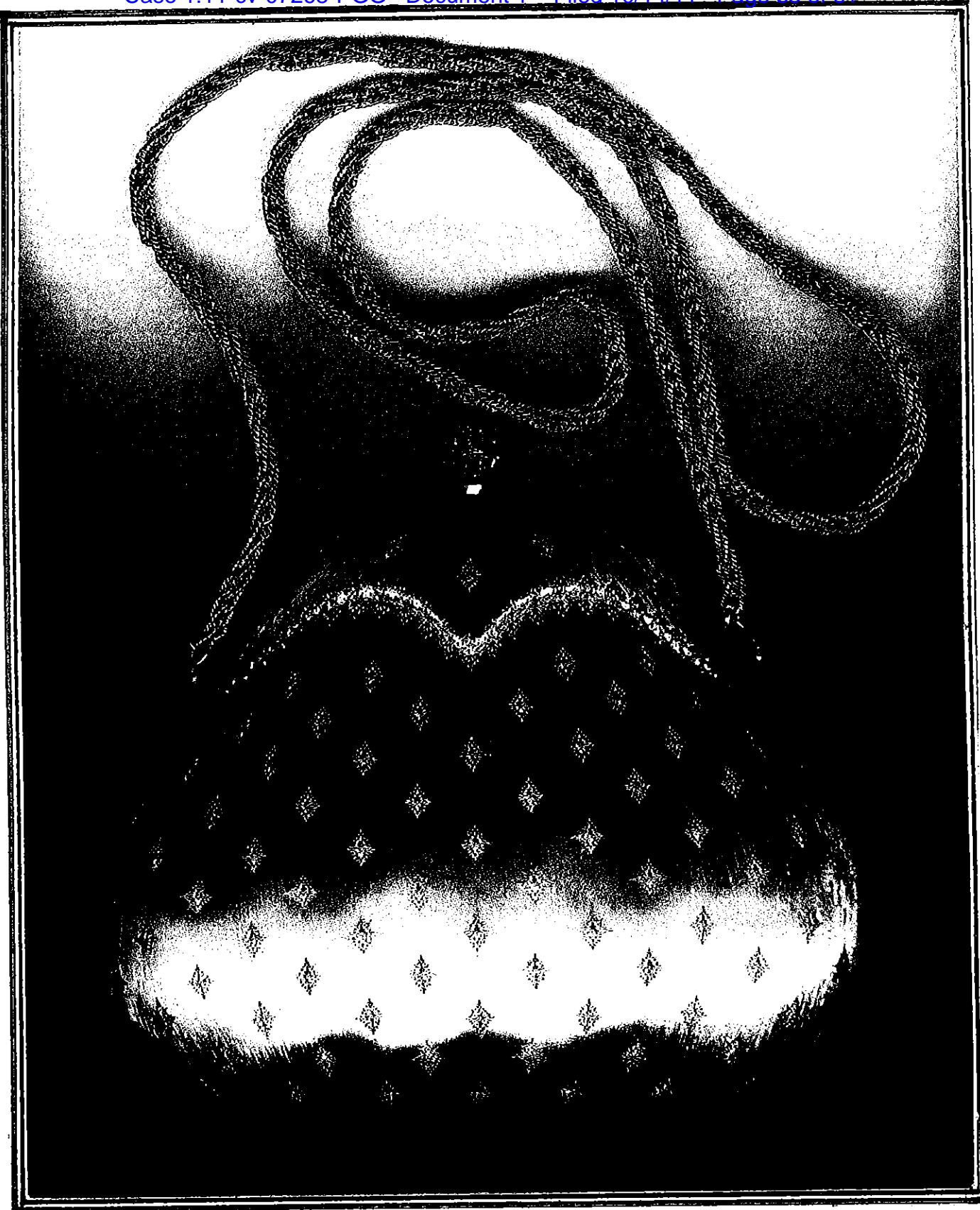




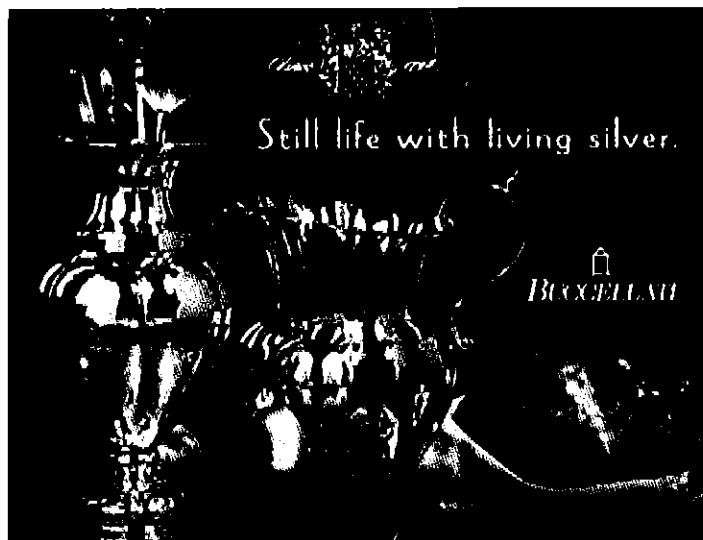
-X2681



GIANMARIA
BUCCCELLATI



Gianmaria Buccellati



Still life with living silver.

Buccellati

The spirit of the Italian Masters informs every aspect of Buccellati design. Ancient traditions of found craftsmanship achieve a modern expression in the Attilio Pizzolato Collection. Shown here: Sterling Silver Vase, \$875 and Pitcher, \$1,250.

SHREVE, CRUMP & LOW

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www.shreve.com/ny/buccellati

BUCELLATTI

The house of Buccellati in Italy is one of Europe's premier silversmiths - considered by most the Tiffany of Europe. It annually designs many of the world's most spectacular creations in sterling Silver. It is the passionate dedication to design, craftsmanship and quality that allows Buccellati to sustain the highest level of product integrity.

Prestige Sterling Collection at The Silver Queen Inc.

Silver Queen
We offer
Free
Shipping
on all
Buccellati
Silver



"Villa Palladio" Sterling baby gifts
collection by Buccellati:
Baby Spoon #13617503
Porring #13617502
Baby Cup #13617501

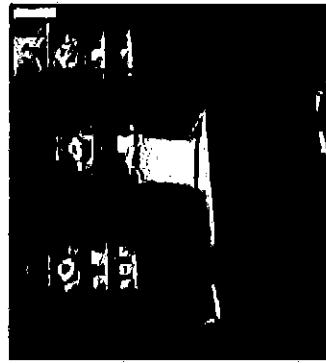
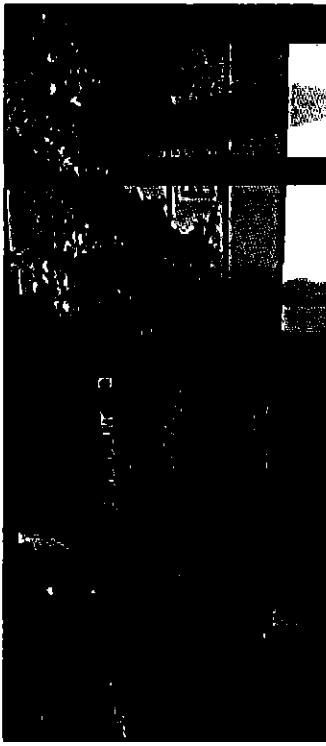
BUCELLATTI

*Buccellati of Italy is one the finest
makers of sterling in the world.*

BUCCELLATI

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USA

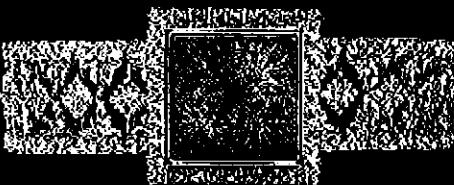
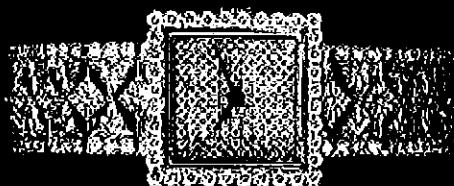
ASIA / OCEANIA

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Fax (852) 2577-5031

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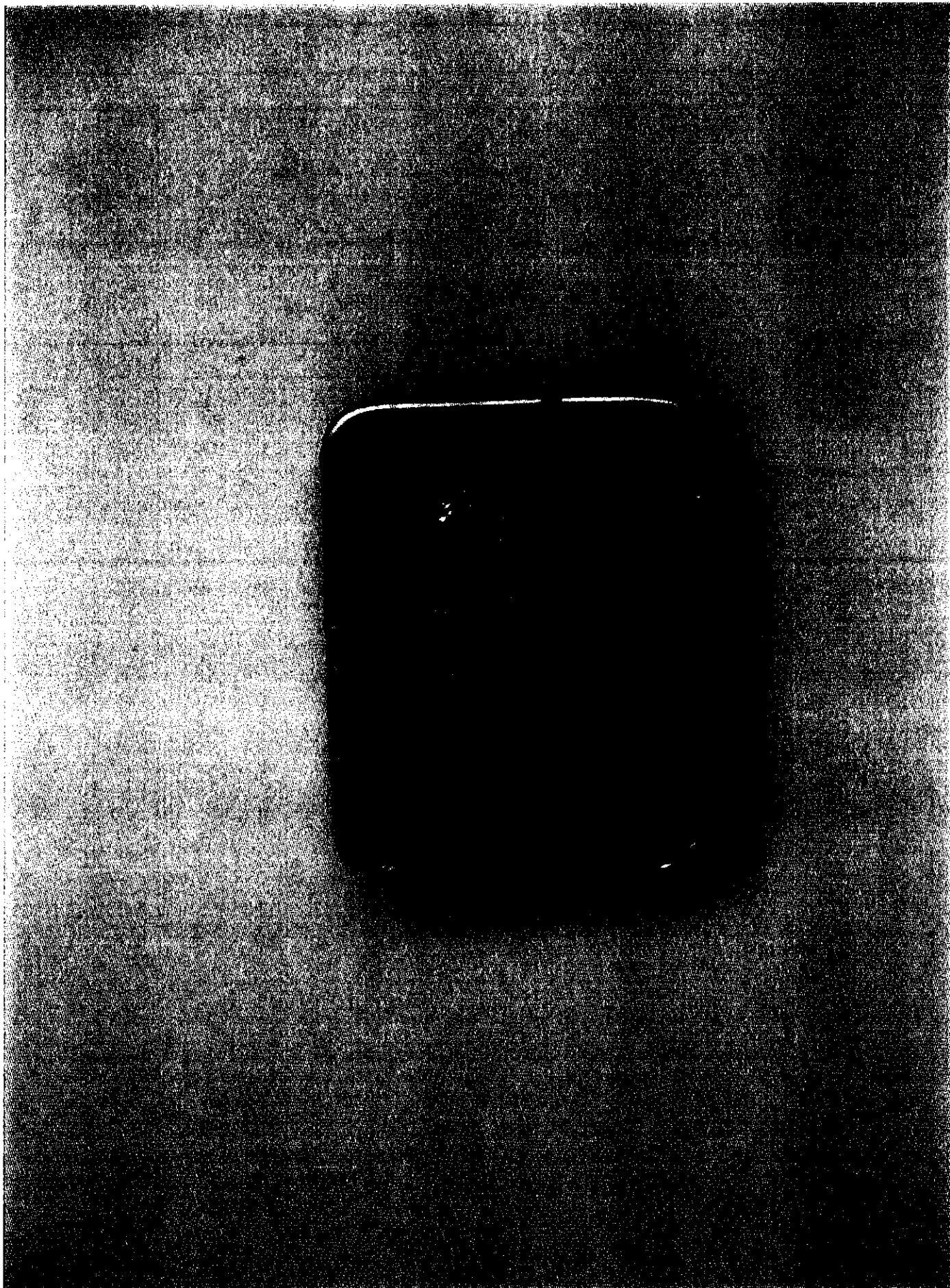
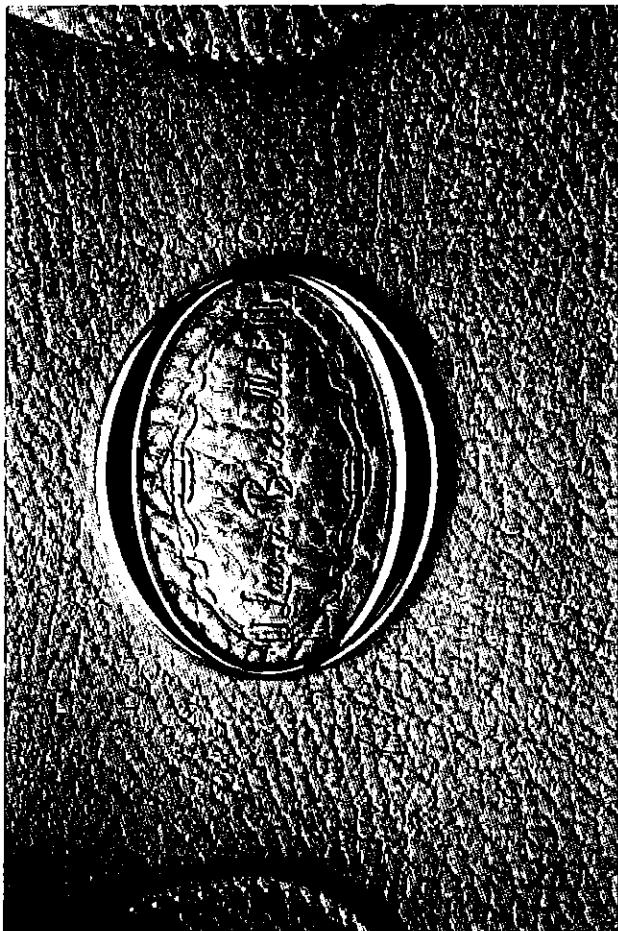
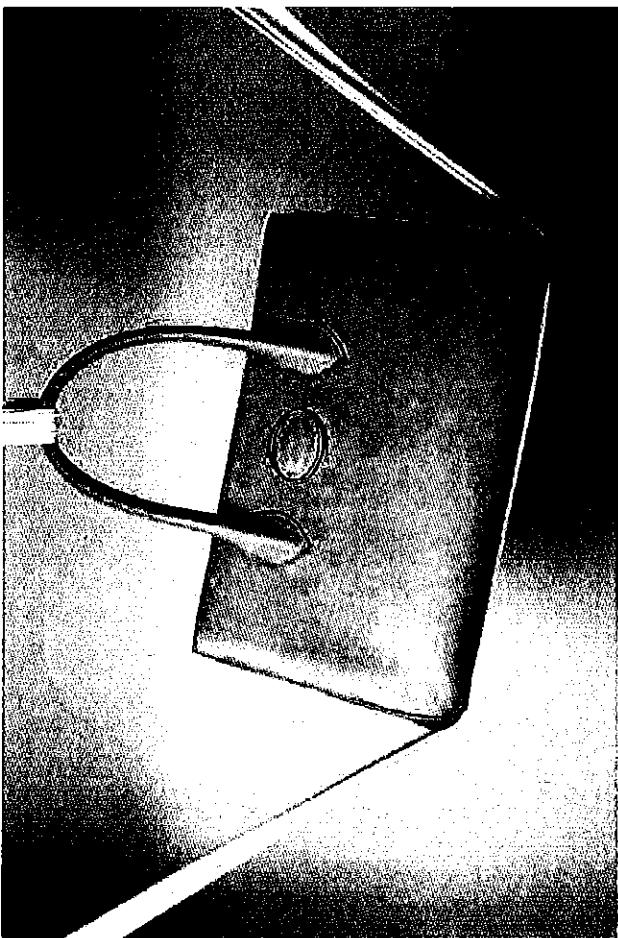




EXHIBIT C



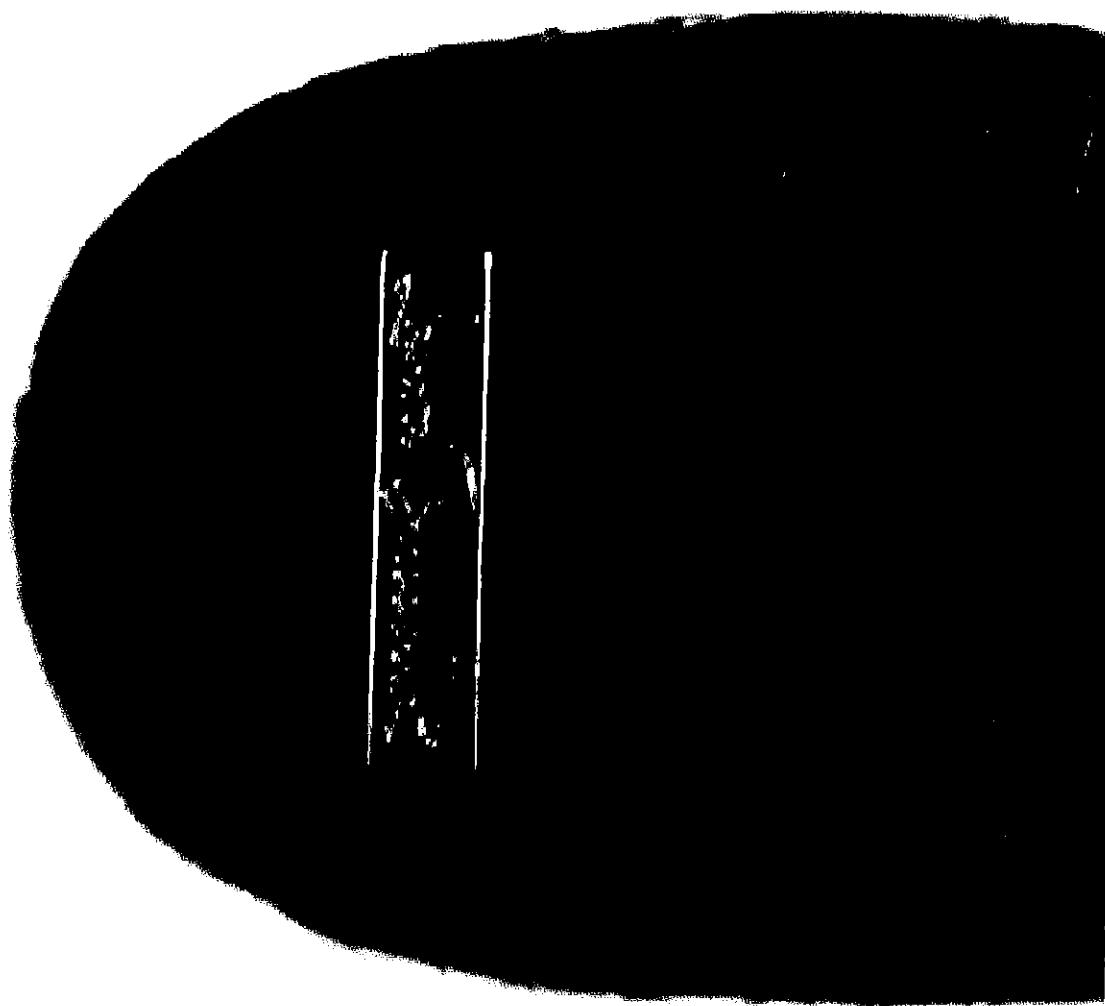
Back Cover: Gwen Black Leather

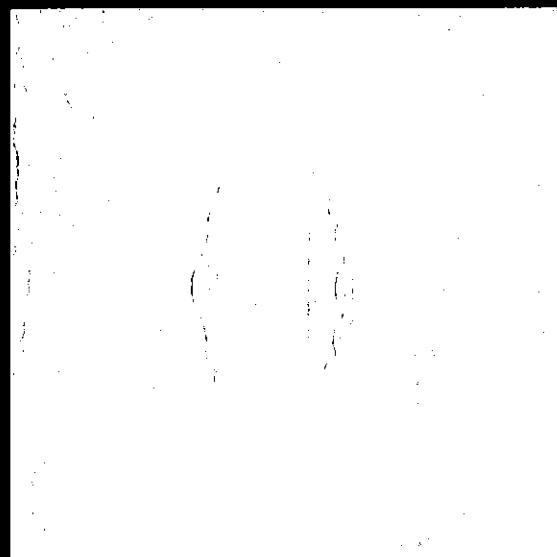
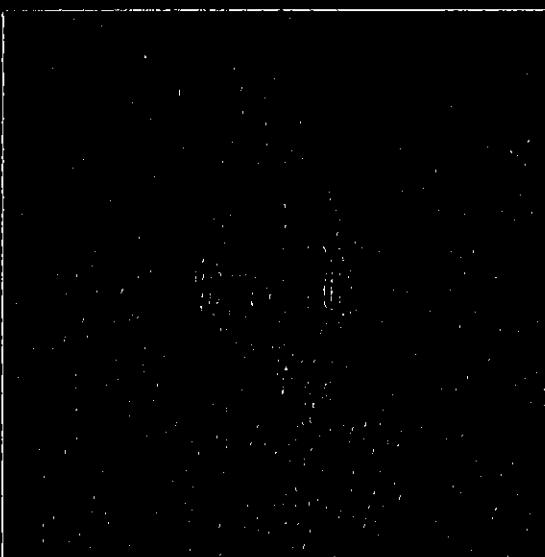
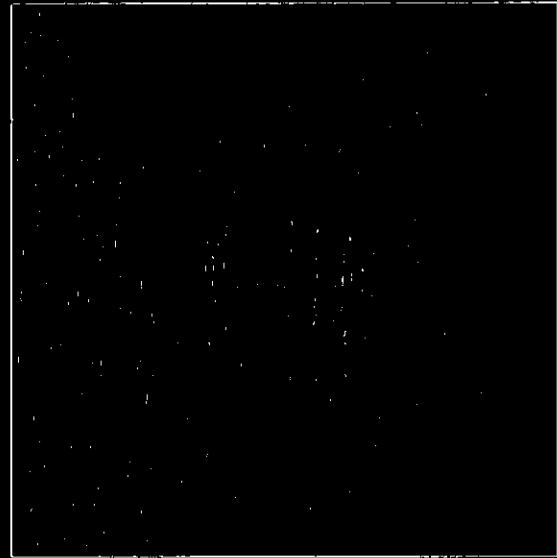
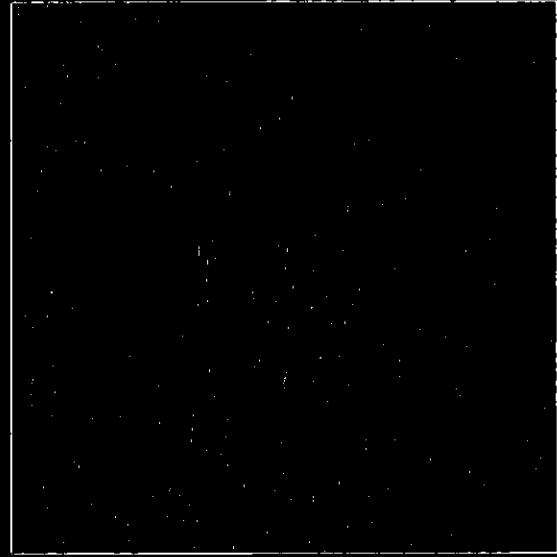


Gwen Zahalone Leather

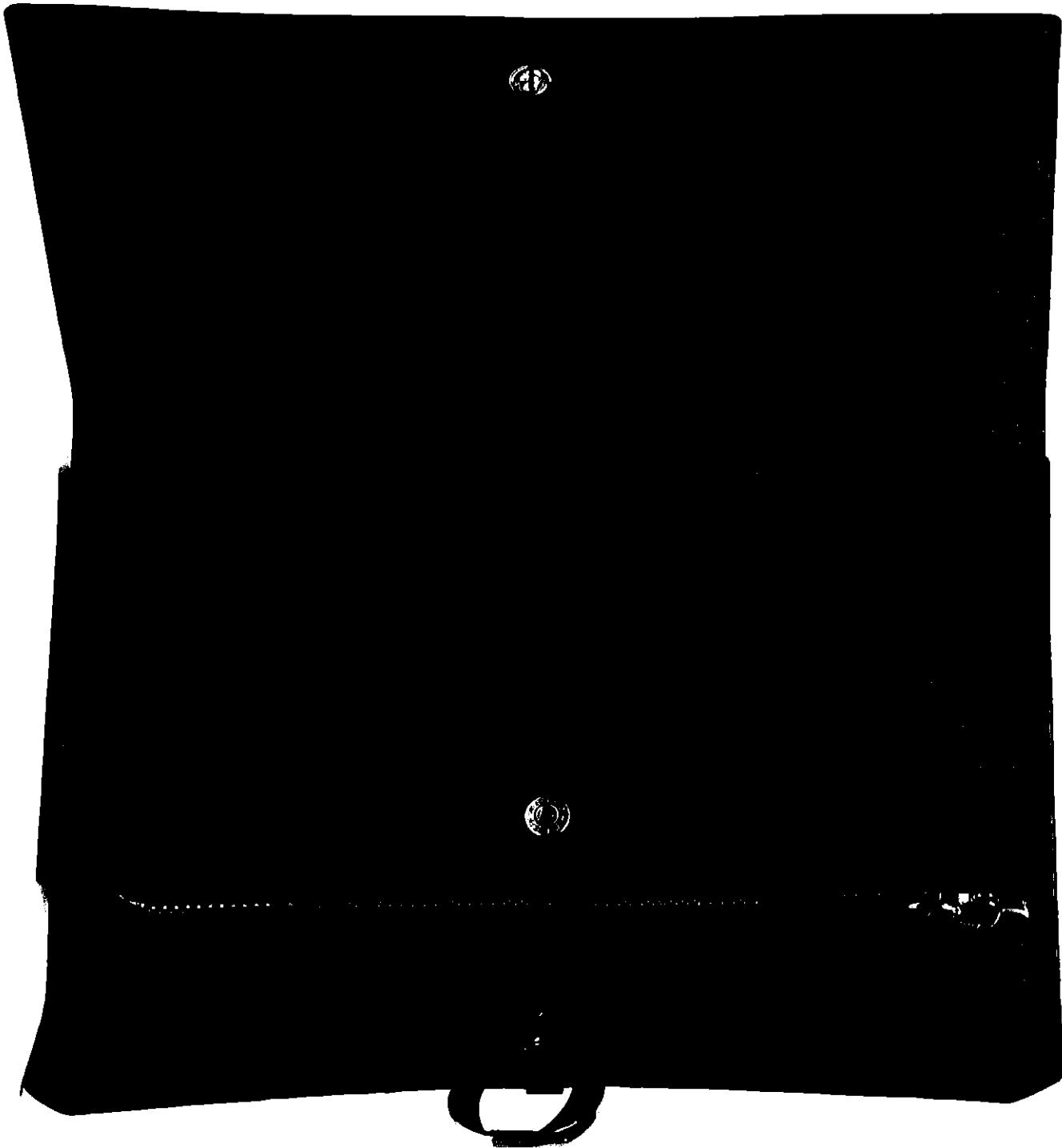


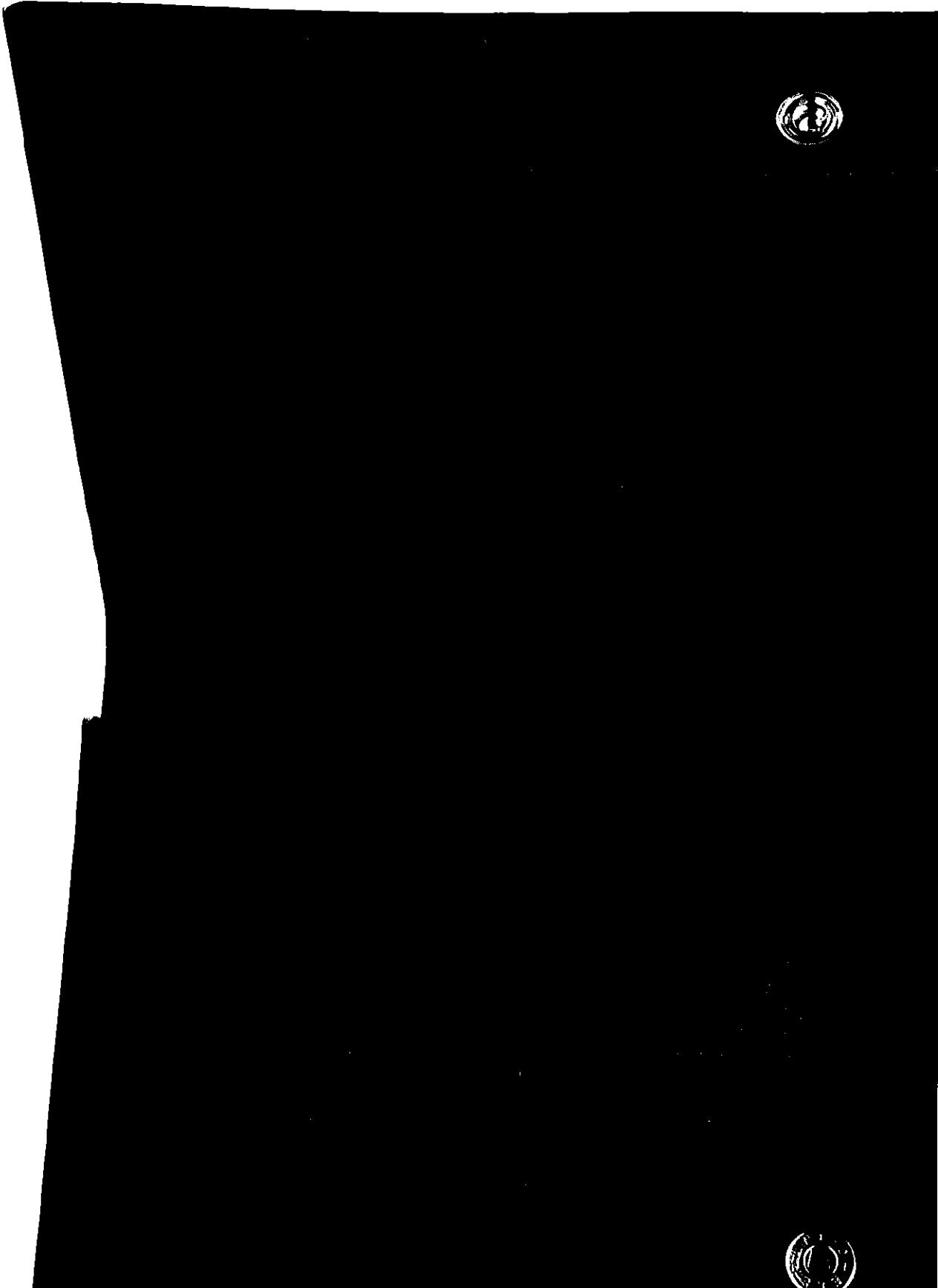


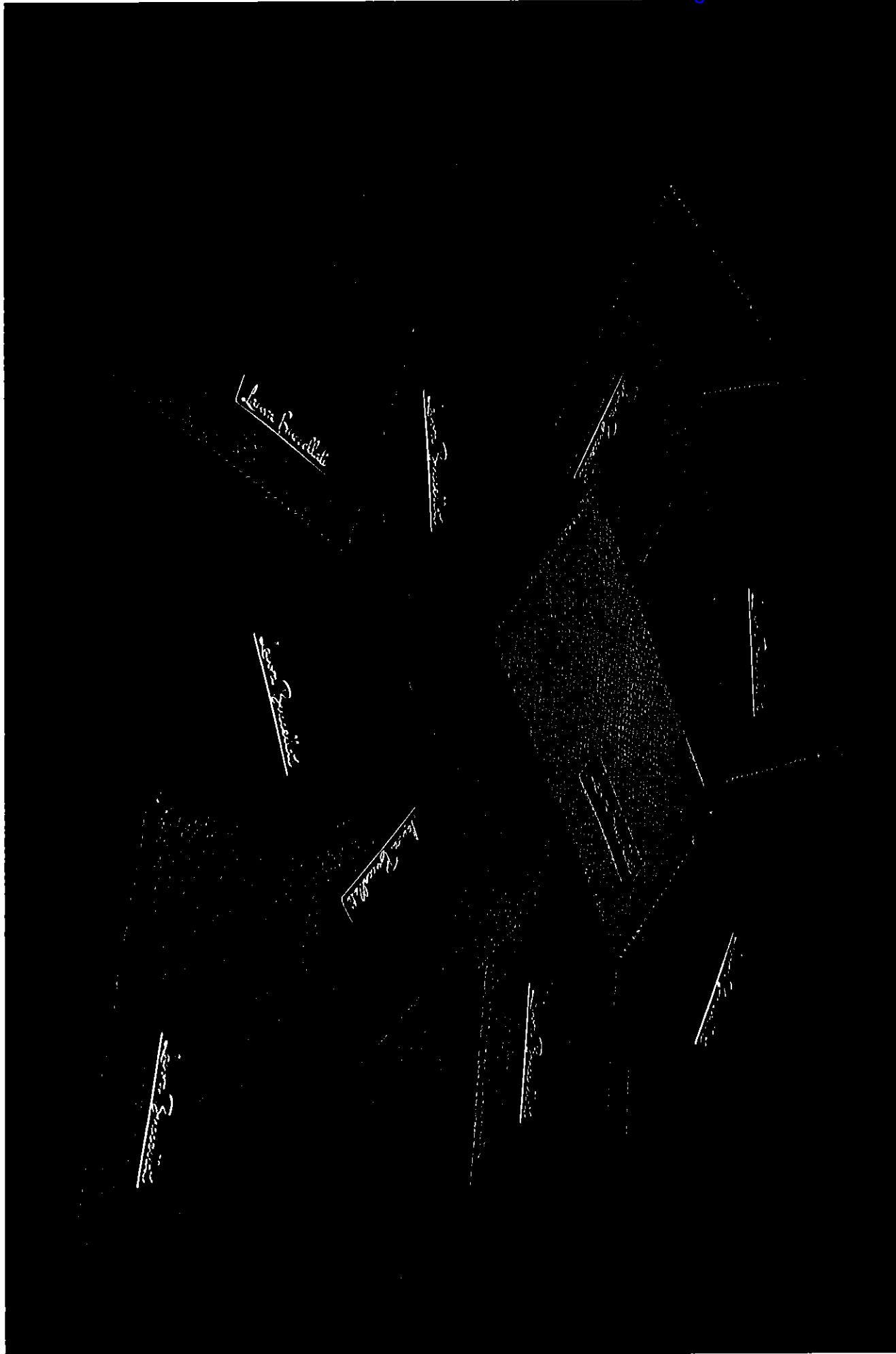




*Available in (top row left to right) Cognac, Midnight Blue, Cranberry.
Bottom row (left to right) Winter White, Fern, Coffee.*









Laura Buccellati

LAURA BUCELLATI

o // 305.416.3123

f // 305.416.3106

LAURA@LAURABUCELLATI.COM

WWW.LAURABUCELLATI.COM

for
Linda
Buccellato





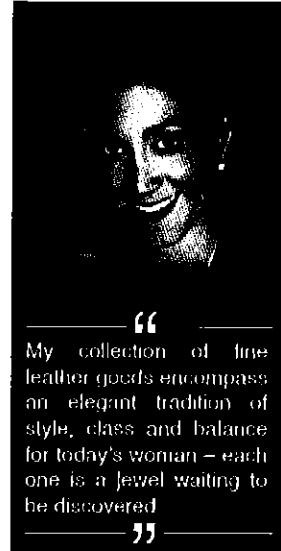
EXHIBIT D

Laura Buccellati

The Brand

Creator and founder Laura Buccellati debuts her signature line of handmade carryalls designed for the discriminating handbag connoisseur. The stylish, modern line is rooted in the belief that a handbag should be both appealing and of superior quality with feminine flair. Each fine leather good is made from the finest exotic skins including crocodile, ostrich, stingray, lizard and suede accented by palladium and gold details. Each piece is handcrafted with the utmost commitment to detail by skilled Italian artisans. Every step of the production process incorporates authentic old-world craftsmanship, such as polishing crocodile skin with an agate stone to produce a lustrous shine.

Luxurious, high-quality, chic and yet sophisticated and functional, Laura Buccellati holds true to her name with timeless designs. The collection of fine leather accessories follows in the footsteps of her family's tradition of excellence and impeccable craftsmanship.

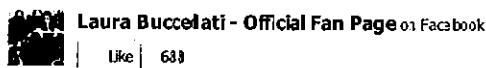


“
My collection of fine leather goods encompasses an elegant tradition of style, class and balance for today's woman – each one is a jewel waiting to be discovered.”

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Laura Buccellati

Laura Buccellati

Laura Buccellati credits her passion for designing fine leather accessories to her family's cultural heritage and grandparents, Mario and Maria Buccellati, the beacons of her current creations. Following the footsteps of her family - legendary jewelers known for their impeccable designs and distinctive style - and growing up under the renowned Buccellati name, is one of many inspirations that motivated Laura to pursue a career designing exclusive leather accessories for today's handbag connoisseur.

"My passion for handbags began when I was a little girl. I remember my first bag - a memory that's more significant than receiving my first kiss," says Laura Buccellati. At the age of six, Laura's father gifted her with a handcrafted calfskin carryall with engraved initials from Milan. An additional influence was her grandmother's infinite assortment of vintage bags. "My current collection consists of prized items owned by my grandmother. With a few dating back to the 1920s, I remember my grandmother dressing them up for luncheons to a night out on the town. I refer to them as forever bags, as they have no apparent signs of being worn."



While vacationing in Italy, a frequent travel destination for Laura, introduced her to a lifelong business enterprise. Founded in 2009, Laura Buccellati was developed while she perused an attractive Italian carryall. Laura's instant knowledge of the luxury market and its lack of superior merchandise championed her to create an accessory collection that can last a lifetime. "I find that the market is saturated with designers that relate quality to expensive trends – two unrelated factors. I found that luxury was lost and my goal is to produce goods that will stand the test of time," says Laura Buccellati. "Our materials are of the highest caliber and utilized at the greatest level. It is our objective to provide quality handbags and accessories in traditional silhouettes and styles to complement a woman's wardrobe as well as accommodate her lifestyle." Creating a legacy of her own, Laura understands the concept of thoroughly combining color, texture and structure into luxurious fashion accessories.

Coined as "a jewel of a bag," Laura's Signature Collection follows in the footsteps of the Buccellati family tradition of excellence and impeccable craftsmanship. Preferring sophisticated designs over flamboyant, of-the-micro-moment trends, Laura features classic silhouettes for the debut of the line. The assortment features satchels, totes and clutches that offers an effortless transition from the office to an evening out on the town. "By striving to achieve that old world craftsmanship so rarely found today, we set ourselves apart from general handbag designers." The unparalleled expertise of the brand, meticulous manufacturing techniques, attention to detail and incorporation of raw materials ensures all products are handcrafted by skilled Italian artisans to not compromise fine materials including brass, palladium, butter soft suede and exotic skins including crocodile, ostrich, reptile and stingray.

The methodical production is the essential feature of the Buccellati legacy. With an elegant tradition of refinement and sophistication, Laura's Signature Collection is measured as timeless pieces of art. "My handbags encompass style, class and balance. Surpassing mere function, I believe they should be more than a vessel for our belongings, but a reflection of our lifestyle" says Laura. "Each carryall is crafted as a heritage piece to be enjoyed for generations to come."

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Laura Buccellati is a collection of exotic skin handbags and leather goods that incorporate the finest materials. Discover your "Jewel of a Bag" at www.laurabuccellati.com

687

Likes

Basic Information**Founded****January 2013****About**

Laura Buccellati is a collection of exotic skin handbags and leather goods that incorporate the finest materials. Discover your "Jewel of a Bag" at www.laurabuccellati.com

Company Overview

Laura Buccellati is a line of luxury handmade carryalls designed for the discriminating handbag connoisseur.

Description

Each fine leather good is made from the finest exotic skins including crocodile, ostrich, stingray, lizard and suede accented by palladium and gold details. Luxurious, high-quality and yet sophisticated and functional, Laura Buccellati holds true to her name with timeless designs.

Mission

The stylish, modern line is rooted in the belief that a handbag should be both appealing and of superior quality with feminine flair.

Products

Fine leather accessories including handbags, wallets and belts.

Website

<http://www.laurabuccellati.com>

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It is with great delight to unveil my Fall/Winter 2010 contemporary collection.

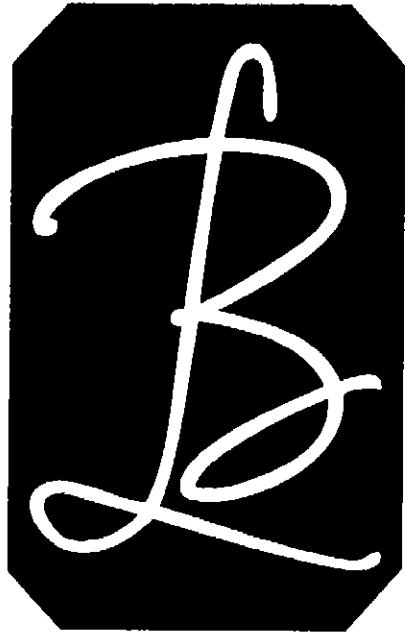
Your jewel of a bag is waiting to be discovered.

~Laura Buccellati



*“Each handbag is a jewel
waiting to be discovered.”*

Laura Buccellati



Jewel of a Bag

Laura Buccellati
Laura Buccellati, LLC
Office 305.416.3123
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